

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MOOG INC.,

Plaintiff,

v.

Case No.: 1:22-cv-00187

SKYRYSE, INC., ROBERT ALIN
PILKINGTON, MISOOK KIM, and DOES NOS.
1-50,

Defendants.

DECLARATION OF RENA ANDOH

RENA ANDOH, under penalty of perjury and pursuant to 28 U.S.C. § 1746,
declares the following to be true and correct:

1. My name is Rena Andoh. I am a partner at Sheppard, Mullin, Richter & Hampton LLP. I am over the age of 18 years old. I have personal knowledge of the matters set forth herein and if called as a witness, I could and would competently testify as to all facts set forth herein. I am counsel for plaintiff Moog Inc. (“Moog”) and I provide this declaration in support of Moog’s Motion for Adoption and Entry of Proposed Inspection Protocol.
2. Attached as Exhibit “A” is a true and correct copy of Moog’s proposed Inspection Protocol.
3. Attached as Exhibit “B” is a true and correct copy of defendant Skyryse, Inc.’s (“Skyryse”) proposed Inspection Protocol.

4. Attached as Exhibit “C” is a true and correct copy of a letter served by counsel for Moog on March 21, 2022.

5. Attached as Exhibit “D” is a true and correct copy of e-mail correspondence dated April 4, 2022 between the parties and iDiscovery Solutions, regarding the electronic devices turned over by defendants Misook Kim and Robert Alin Pilkington.

6. Attached as Exhibit “E” is a true and correct copy of a letter served by counsel for Skyrise on April 1, 2022.

7. Attached as Exhibit “F” is a true and correct copy of a letter served by counsel for Moog on April 27, 2022.

8. Attached as Exhibit “G” is a true and correct copy of a letter served by counsel for Skyrise on April 29, 2022.

9. Attached as Exhibit “H” is a true and correct copy of a letter served by counsel for Skyrise on May 4, 2022.

10. Attached as Exhibit “I” is a true and correct copy of a letter served by counsel for Skyrise on May 5, 2022.

11. Attached as Exhibit “J” is a true and correct copy of the May 4, 2022 letter submission to the Court from individual defendants Misook Kim and Robert Alin Pilkington.

12. Attached as Exhibit “K” is a true and correct copy of Moog’s Request for Production of Documents served to Skyrise on March 21, 2022.

I declare that the foregoing is true and correct under penalty of perjury under the laws of the United States of America.

Dated: May 11, 2022

/s/ Rena Andoh
Rena Andoh